

JASON M. FRIERSON
United States Attorney
Nevada Bar Number 7709
NADIA AHMED
Assistant United States Attorney
Nevada Bar Number 15489
501 Las Vegas Boulevard South, Suite 1100
Las Vegas, Nevada 89101
(702) 388-6336 / Fax: (702) 388-5087
nadia.ahmed2@usdoj.gov

Attorneys for United States of America

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,)	Case No. 2:11-cr-00347-KJD-VCF
)	
Plaintiff,)	STIPULATION TO CONTINUE
vs.)	SENTENCING HEARING
)	
DAVID A. LITWIN,)	
)	(Fourth Request)
Defendant.)	
)	

IT IS HEREBY STIPULATED AND AGREED, by and between undersigned counsel for the government and undersigned counsel for the defendant, David A. **LITWIN**, that the sentencing hearing currently scheduled for June 11, 2024, at 10:00 am, to a date and time convenient to the Court no earlier than 90 days from the current setting, and preferably to the dates indicated below.

This Stipulation is entered into for the following reasons:

1. The parties request additional time to prepare for the sentencing. The defense needs additional time to complete certain relevant medical evaluations. Additionally, the defendant needs additional time to review and revise the draft presentence investigation report, and based on the long and unusual history of the case, Mr. Litwin's sentencing memorandum requires more than usual research and preparation time.

1 2. As laid out in the government's unopposed Motion to Extend Time (ECF No.
2 922), the Ninth Circuit requires the forfeiture and sentencing hearings to be staggered over a
3 period of time to allow the Court to issue its ruling and for the parties to propose modifications
4 to the final order of forfeiture at sentencing. ECF No. 922. Accordingly, the government filed
5 its unopposed motion, *id.*, which the Court granted on May 22, 2024. ECF No. 924.

6 3. After consulting the Court's calendar, the parties request that the Court set the
7 dates for the forfeiture and sentencing hearings as follows: that the forfeiture hearing take place
8 on August 6, 2024, at 9:30 a.m. and that the sentencing hearing take place no sooner than
9 thirty days after the forfeiture hearing, after September 9, 2024.

10 4. Mr. Litwin remains on pretrial release and is not opposed to this request to
11 continue the forfeiture and sentencing hearing dates.

12 5. This is the fourth request to continue the sentencing date and neither party is
13 prejudiced by the requested extension, whereas denial of the request would cause prejudice to
14 both parties.

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